

**FILED**

**MAR 27 2015**

**U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

JUSTIN E. PAYNE,

Defendant.

No.

**4:15CR00146 NCC**

**FILED UNDER SEAL**

**MOTION FOR SUPPRESSING & SEALING ORDER**

COMES NOW the United States of America, by and through its attorneys, Richard G. Callahan, United States Attorney for the Eastern District of Missouri, and Colleen C. Lang, Assistant United States Attorney for said District and moves this Court for an order directing that Information entered by this Court be sealed until Tuesday, March 31, 2015, except for the limited purposes of providing same to defense counsel pursuant to Rules 12 and 16 of the Federal Rules of Criminal Procedure.

In support of this Motion, the Government provides the following facts, establishing that

(a) the government has a compelling interest in sealing the documents in question which outweighs the public's qualified First Amendment right of access to review those documents; and

(b) no less restrictive alternative to sealing is appropriate or practical:

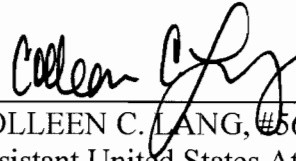
This is an on-going investigation until the defendant is arrested. The FBI wants to take precaution in arresting the defendant because he has made threats against law enforcement in the past.

WHEREFORE, for the reasons stated above, the Government respectfully requests that Information be sealed until Tuesday, March 31 2015.

Dated this 27th day of March, 2015.

Respectfully submitted,

RICHARD G. CALLAHAN  
United States Attorney

A handwritten signature in black ink, appearing to read "Colleen C. Lang", is written over a horizontal line.

COLLEEN C. LANG, #56872MO  
Assistant United States Attorney